

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
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*Attorneys for Creditor, Seterus, Inc., as authorized
sub-servicer for Federal National Mortgage
Association ("Fannie Mae"), a corporation organized
and existing under the laws of the United States of
America.*
By: Jeanette F. Frankenberg, Esq.

In Re:

Ralph A Davis

Debtor(s).

Chapter 13

Case No.: 15-28859-ABA

Hearing Date:

Judge: Andrew B. Altenburg Jr.

**CERTIFICATION OF DEBTOR(S) DEFAULT AND REQUEST FOR ENTRY OF AN
ORDER VACATING THE AUTOMATIC STAY AS TO REAL PROPERTY TO
SECURED CREDITOR**

I, Daniel Cranston, hereby certify as follows:

1. I am a Document Management Specialist of Secured Creditor, Seterus, Inc., as authorized sub-servicer for Federal National Mortgage Association ("Fannie Mae"), a corporation organized and existing under the laws of the United States of America ("Secured Creditor" and/or "Movant"), and I am fully familiar with this matter.

2. After the debtor's first default in payments, Secured Creditor filed a Motion for Relief from the Automatic Stay. Subsequently, Secured Creditor resolved the issues with the debtor's attorney and an order was entered resolving the motion for relief. The duly entered Order provided for, among other things, the debtor to make monthly payments sufficient to cure the post-petition default while maintaining the regular monthly mortgage payment. The remaining terms of the order are set forth in the annexed **Exhibit A**, a true copy of the **Order** resolving the original motion for relief. The Court's attention is respectfully directed to the

default clause of the order providing for the submission of the within certification and form of order upon default.


3. As of the execution of this certification, according to Secured Creditor's records, the debtor has failed to comply with the terms of the Order by failing to make the regular monthly mortgage payments outside the Plan. The debtor is currently due for 8 Monthly Payment (June 2016 – January 2017) 8 x \$551.20 - \$202.56 (Suspense). The total amount past due is \$4,207.04. The above-mentioned payments are more than 30 days delinquent.

4. Simultaneously with the submission to the Court of the within Certification and proposed form of Order, copies of these documents are being served upon the debtor, counsel for the debtor and the Standing Trustee.

5. Based on the above, the debtor has failed to meet the conditions to continue the Automatic Stay, and it is respectfully requested that this Court enter an Order Vacating the Automatic Stay as to Real Property to the Secured Creditor.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: FEB 15 2017



Signature